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December 24, 2008

Susan Era
Deputy Director
Area Agency on Aging
Mendocino County
Department of Social Services
747 S. State Street
Ukiah, CA 95482

Dear Ms. Era:

Enclosed is a report issued by the California Department of Aging (CDA), which summarizes the onsite comprehensive assessment of the Area Agency on Aging (AAA), Mendocino County, Department of Social Services, serving Planning and Service Area (PSA) 26. CDA staff conducted the visit October 6-9, 2008. The purpose of the visit was to review the Administrative, Fiscal, and Program components of your direct and contracted Title III/VII, Title III E, and Community-Based Services Programs (CBSP).

The format of the report contains five specific sections that include: Recap/Overview of Monitoring Visit, Best Practices or Models of Service Delivery, Technical Assistance, Findings Requiring Corrective Action, and a Corrective Action Plan (CAP).

For your convenience, the required actions to be taken by the AAA to correct specific findings associated with the monitoring visit are summarized into a CAP format. A copy of the CAP will be sent to you via email to allow for the electronic completion of the plan. When completing the CAP, detail in Column F the action you plan to take to resolve the findings specified in Column C. Any documentation you submit to verify compliance with a required action should be detailed in Column E. Please provide a response to the findings within 30 days from the date of this letter using the CAP format provided. Submit the CAP electronically to Eura Trent at etrent@aging.ca.gov. If the AAA needs to submit documents to verify compliance, please submit a hard copy of the CAP along with the additional documentation.

We would like to thank you, your staff, the Governing Board Chair, and the Advisory Council Chair for all the assistance and hospitality during our visit. For your convenience we have enclosed two copies of this report. Please provide a copy to your Governing Board Chair and your Advisory Council Chair.

CDA will conduct a comprehensive assessment of your agency again in 2012. In the meantime, please do not hesitate to contact us should you or your staff have questions regarding the administration of programs funded through the Older Americans Act or Older Californians Act.

Sincerely,

Geri Baucom, Coach
Monitoring Protocol Team

Enclosures

cc: Carol Hutchinson, Chair, AAA Governing Board

Patricia Jauregui-Darland, Chair, AAA Advisory Council

Lynn Daucher, Director
California Department of Aging

Edward P. Long, Deputy Director
Long-Term Care and Aging Services Division

**AREA AGENCY ON AGING
MENDOCINO COUNTY
DEPARTMENT OF SOCIAL SERVICES**

PSA 26

**REPORT OF THE
COMPREHENSIVE ASSESSMENT VISIT**

**Conducted by the
California Department of Aging
October 6-9, 2008**

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The onsite assessment of the Area Agency on Aging (AAA) for Planning and Service Area (PSA) 26 was conducted by staff of the California Department of Aging (CDA) from October 6-9, 2008. Staff present were Don Braeger, Policy Manager; Geri Baucom, Monitoring and Fiscal Coach; and Aging Programs Specialists Tasha Wilson (Administrative); Eura Trent (Administrative); Anthony Perez (Fiscal); Barbara Estrada (Elderly Nutrition Program, Brown Bag, and Title III D Disease Prevention and Health Promotion); and Kathleen Hendrickson (Title III B Supportive Services, Title III B Information and Assistance, Disaster Preparedness, Alzheimer's Day Care Resource Center, and Linkages). In addition, Joel Weeden conducted a desk review of the Title III E Family Caregiver Support Program.

This report includes:

- Recap of the standards monitored during the visit.
- Recognition of best practices or models of service delivery discovered during the monitoring visit that will be shared with the aging network by posting a notice on CDA's website.
- Documentation of the technical assistance on specific program standards provided to the AAA
- Findings and required actions to be taken by the AAA to correct specific findings associated with the monitoring visit.
- Corrective Action Plan to be completed by the AAA and submitted to CDA.

RECAP/OVERVIEW OF MONITORING VISIT

This section provides a recap of the standards monitored during the visit and the recognition of the AAA staff that assisted CDA to accomplish its work.

Administrative Review

Governing Board

In October 2005, the California Department of Aging designated Planning and Service Area (PSA) 26 Area Agency on Aging (AAA), a Joint Powers Authority, as the AAA serving Lake and Mendocino Counties. The Governing Board is comprised of two Supervisors from each county (or their representatives) and a member-at-large. The member-at-large serves for two years and the appointment rotates between the two counties. According to the Joint Powers Agreement, Mendocino County serves as the lead agency in administration of PSA 26 AAA.

Geri Baucom, Tasha Wilson, Eura Trent, and Don Braeger met with Carol Huchingson, Governing Board Chair, and Susan Era, AAA Director, to determine if the Governing Board, as the policy-making body of the AAA, recognizes and fulfills its roles and responsibilities as required by all regulations, laws, and contracts. The Governing Board meets every other month, and meets with the Advisory Council twice a year, once in Lake County and once in Mendocino County. The Governing Board sets priorities for the AAA, reviews and approves the Area Plan, and approves contracts. The two counties are working together to improve services and increase funding in the PSA.

Advisory Council

Geri Baucom, Tasha Wilson, Eura Trent, and Don Braeger met with Patti Darland, Advisory Council Chair, Susan Era, AAA Director, and Lori Sweeney, AAA Program Manager, to determine if the Advisory Council is provided the opportunity to (1) advise the AAA on all matters related to the development and administration of the Area Plan and all operations conducted under the plan, and (2) further the AAA's mission of developing a community-based system of care for older persons living within the PSA. The Advisory Council is comprised of ten members, five from each county. The Advisory Council meets monthly, except in December, and works closely with the Governing Board. Ms. Darland indicated that vacancies are hard to fill and that training of new Advisory Council members is very important. The Advisory Council is involved in the development of the Area Plan and is provided a copy of the Area Plan matrix used by AAA staff to monitor goals and objectives. The Executive Committee reviews the bylaws annually and updates as necessary.

Staffing and Organization

Tasha Wilson and Eura Trent met with Trayce Beards, AAA Program Specialist, to determine if the AAA has an adequate number of trained staff to administer programs to

older individuals living within the PSA. Ms. Wilson reviewed the most recent organizational chart and verified the positions identified on the budgets submitted to CDA matched the AAA's organizational structure. County mandated training and career development classes are offered through the Mendocino County Office intranet, and staff are encouraged to attend work related training and conferences such as C4A. Duty statements, desk manuals, and the Personnel Procedures Manual were reviewed and it was determined that personnel practices and procedures have been established and are well maintained.

Procurement/Contract Process

Tasha Wilson and Eura Trent met with Lori Sweeney, AAA Program Manager, and Trayce Beards, AAA Program Specialist, to determine if the AAA has established systematic procedures for the award and administration of contracts in the Area Plan and to ensure the AAA awarded contracts through an open and competitive process. The latest RFP, issued in January 2007, contained most of the required components. Programs included in the RFP were Alzheimer's Day Care Resource Center (ADCRC), Brown Bag, Congregate Nutrition, Family Caregiver Support Program (FCSP), Home Delivered Meals (Meals on Wheels), Information and Assistance/Outreach, In-Home Assistance, Linkages/Respite Purchase of Service (RPOS), and Senior Legal Assistance.

Area Plan Achievement

Tasha Wilson and Eura Trent met with Lori Sweeney, AAA Program Manager, to determine if the AAA has a process for monitoring and tracking the progress of goals and objectives in the current approved Area Plan. Fiscal, program, and data staff work collaboratively to develop the Area Plan. AAA staff have regular meetings for development, staff review, and monitoring the progress of Area Plan goals and objectives. Progress and completion of goals and objectives are tracked on the Area Plan matrix and shared at Advisory Council and Governing Board meetings. Adjustments are made through the Year End Report and Area Plan Update as necessary.

Targeting/Needs Assessment

Tasha Wilson and Eura Trent met with Lori Sweeney, AAA Program Manager, to ensure the AAA conducts a needs assessment once every four years and targets older individuals with the greatest economic or social needs with particular attention to low-income, minority individuals who live within the PSA. A needs assessment was conducted in November, 2007. Surveys were distributed at senior centers, libraries, health fairs, and to In-Home Supportive Services (IHSS) clients. In addition, survey distribution was coordinated with Nuestra Casa and Consolidated Tribes to include the PSA's targeted minority population. The surveys were available in English and Spanish and were also available online via the internet. Of the 5,000 surveys distributed, 1,200 were returned. AAA also surveyed 104 residents of skilled nursing facilities in Lake and Mendocino Counties in February, 2008. The AAA continues to promote services to targeted populations through wide distribution of their resource guide, coordination with

local community groups, and involvement in public events. Members of the Advisory Council also give power point presentations throughout the PSA on available services.

Community-Based Services

Tasha Wilson and Eura Trent met with Lori Sweeney, AAA Program Manager, to ensure the AAA proactively provides leadership in the development of a comprehensive and coordinated community-based system of services within the PSA. Mendocino County has integrated its Public Health, Mental Health, and Social Services Branches into the Health and Human Services Agency. This integration provides more opportunity for collaboration among the county's many programs and community service providers. The AAA is co-located with county departments such as IHSS, Adult Protective Services (APS), and Public Authority. The Health and Human Services Managers meet monthly ensuring service coordination for seniors living within the PSA. As an example of coordination efforts the AAA held a joint meeting with APS, IHSS, Ombudsman, County Counsel, the District Attorney's Office, and law enforcement to discuss elder abuse issues and conservatorships.

Management of Service Providers

Tasha Wilson and Eura Trent met with Lori Sweeney, AAA Program Manager, to determine if the AAA effectively communicates with, disseminates policies to, and monitors its service providers. The AAA disseminates information to service providers by phone, and through regular email communication. Service Provider meetings are held three times a year and Nutrition Site Directors meet every other month. Ms. Wilson reviewed the monitoring schedule and service provider files and found AAA staff conducted annual monitoring. Monitoring reports included findings, recommendations, and timelines for corrective actions. The AAA also tracks the service provider's activity level. If units of service fall below expectations, the discussions begin with the service provider and a plan is implemented to ensure the service provider maintains appropriate contracted service activity levels.

Data Reporting

Tasha Wilson and Eura Trent met with Trayce Beards, AAA Program Specialist, to verify data collection and reporting processes are in place at all levels to ensure timely submission of complete, accurate, and verifiable data. The AAA uses "Q" Care Access for reporting and submits timely reports to CDA on a consistent basis. Although there has been a problem with missing data for Home-Delivered and Congregate meals, the AAA is working diligently with service providers to improve data reporting.

AAA Fiscal Review

Anthony Perez met with Marie Tuttle, Fiscal Officer, to determine if the AAA maintains a financial reporting system that reflects accurate, current, and complete disclosure of the financial activities of the AAA and its service providers. Mr. Perez reviewed each standard of the CDA Fiscal Review tool and examined the service provider contract language for fiscal requirements. AAA fiscal staff use the County of Mendocino's MUNIS Financial Management Solution System and Excel spreadsheets to track

expenditures and revenues reported to CDA. The AAA maintains proper documentation; several reported expenditures for the month of May 2008 were traced back to the originating invoice.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

The AAA funds Title III B Personal Care, Chore, Homemaker, and Outreach through contracts with local service providers. Kathleen Hendrickson reviewed the contract, RFP, completed Title III B Supportive Services monitoring tools, and the AAA monitoring documents. These programs were last monitored on May 20, 2008, by Trayce Beards, AAA Program Specialist.

Ms. Hendrickson, Mike Parkinson, and Trayce Beards visited the Community Care Management Corporation (CCMC) and met with Dennis Fay, Executive Director; Mary Ann McCorquodale, Supervisor, Linkages and MSSP programs; and Kathy Johnson, Community Resources Specialist.

The AAA also funds Outreach through contracts with Highlands Senior Service Center, Clearlake; Live Oak Seniors, Clearlake Oaks; Lucerne Alpine Seniors, Lucerne; Middletown Senior Citizens, Middletown; Redwood Coast Seniors, Inc., Fort Bragg; and South Coast Seniors, Point Arena.

Ms. Hendrickson and Mr. Parkinson met with staff at Lucerne Alpine Seniors to discuss their Outreach services. Lucerne Alpine Seniors provide social activities, congregate meals, home delivered meals, and support services to the local community.

Title III B—Information and Assistance (I&A)

Kathleen Hendrickson conducted an assessment of the I&A program by reviewing the monitoring tool, RFP, service provider contract, and service provider monitoring. Previously, I&A services were provided in several senior centers throughout the PSA. The AAA has now centralized the service with CCMC and contracts with CCMC to provide I&A services in Ukiah.

Ms. Hendrickson, accompanied by Mike Parkinson, AAA Program Analyst, and Trayce Beards, AAA Program Specialist, met with Kathy Johnson, CCMC Community Resources Specialist, Dennis Fay, CCMC Executive Director, and Mary Ann McCorquodale, CCMC Supervisor, to discuss the I&A program. Monitoring was completed by the AAA for this program on June 26, 2008, and no findings were identified.

During the monitoring visit Ms. Hendrickson tested the (800) 510-2020 line during the day and in the evening and found that the calls are received by Ms. Johnson. However, if Ms. Johnson is unavailable, the receptionist for CCMC answers the telephone and directs the call to Ms. Johnson's voicemail. A call after hours goes directly to

Ms. Johnson's voicemail. Ms. Hendrickson also checked the local telephone books for references to Senior Services. Both the Redwood Empire 2008 Telephone Directory and the Valley Yellow Pages list the 800 number under the Senior Citizens Services Section.

CCMC and Ms. Johnson have developed a computerized system to process the I&A calls so they can achieve 100 percent attempted follow-up and 85 percent successful follow-up of all the assistance calls they receive. Ms. Johnson is very familiar with the resources available in the PSA and shares her knowledge with the community and with the Outreach sites in Lake and Mendocino counties.

Disaster Preparedness

Kathleen Hendrickson met with Trayce Beards, AAA Program Specialist, Mike Parkinson, AAA Program Analyst, and Lori Sweeney, AAA Program Manager, to discuss the AAA's disaster preparation activities. Disaster preparation was also discussed during site visits to CCMC and Lucerne Alpine Seniors.

CCMC I&A staff developed a packet of information for staff at all CCMC sites. This packet includes emergency numbers for both counties, evacuation procedures, and disaster preparation tips. Additionally, the AAA's Area Plan includes an objective to conduct a disaster simulation with their service providers. Ms. Sweeney indicated that this will take place next year.

At CCMC, Dennis Fay, Executive Director, indicated that he had been a Disaster Preparation Officer while in the Air Force and offered his services to the AAA. CCMC and AAA staff also indicated there was some confusion in the county concerning which organization should take the lead on disaster preparation. Although the AAA and CCMC work with Office of Emergency Services (OES), no agency has taken the lead to organize the county. At Lucerne Alpine Seniors, staff indicated that they work closely with the OES and the local fire department. The fire department also provides ambulance services for the area. The Center has a Ham radio to use in emergencies.

Title III C—Elderly Nutrition Program (ENP)

An assessment of the ENP was conducted with Sharon Stewart, AAA R.D., and Trayce Beards, AAA Program Specialist. Barbara Estrada, R.D., reviewed the donation request signs and donation procedures, current ENP menu compliance with Dietary Reference Intakes (DRI), Home-Delivered Meals (HDM) policies and procedures, annual monitoring reports, corrective action plans, eligibility assessments, contracts, quarterly staff training, training evaluations, nutrition education topics, and the CDA ENP monitoring tool.

Ms. Estrada conducted site monitoring of three ENP service providers. The meal programs monitored provided a representative sample of contracted services from both Lake and Mendocino Counties. At Lucerne Alpine Seniors meal service, a kitchen review, eligibility assessments, and past monitoring reports were reviewed with the

Executive Director, Lee Tyree. Ms. Estrada, along with Don Braeger, CDA Policy Manager, reviewed the Lakeport Senior Center site. The visit included review of home delivered meal pack out, a kitchen review, eligibility assessments, the donation procedure, and staff training documentation. At the Redwood Coast Seniors, Ms. Estrada met with Joe Curren, Executive, to review and discuss the meal site.

The AAA has divided oversight of the nutrition programs and administration between Sharon Stewart, AAA R.D., and Trayce Beards, AAA Program Specialist. This system is an efficient practice that allows the AAA to provide program and administrative oversight functions over multiple nutrition sites.

A review of the eligibility assessments at all sites that were visited demonstrated that quarterly assessments have not been completed consistently in the past. However, the eligibility assessments have recently been completed for most HDM program participants.

Title III D—Disease Prevention and Health Promotion

Barbara Estrada met with Lori Sweeney, AAA Program Manager, to discuss the Title III D Disease Prevention and Health Promotion program. The funding for this program is used to provide the File of Life and Pill Boxes and to develop community outreach for a fall prevention program. During the wildfires this past summer, the AAA requested to use Title III D funding to purchase 26 air purifiers for home bound seniors and to establish clean air centers at local senior centers. CDA granted special permission for the use of the funds to provide the air purifiers.

Title III E—Family Caregiver Support Program (FCSP)

The OAA-funded multifaceted support system for unpaid family caregivers in Lake and Mendocino Counties is provided through a contract with North Coast Opportunities (NCO), which operates the Redwood Caregiver Resource Center (RCRC). RCRC was established in 1986, as part of statewide system funded by the California Department of Mental Health to serve families caring for a loved one with adult onset brain impairment. In accepting the Title III E funds to be the AAA's only FCSP service provider, this NCO program must also ensure it reaches out to FCSP-eligible caregivers and provides caregiver support in accordance with OAA expectations.

CDA caregiver policy specialist Joel Weeden visited RCRC during the comprehensive assessment of the Sonoma County AAA in October of 2007. This eliminated the need to travel to PSA 26 to conduct a review of Title III E services. Mr. Weeden conducted a "desk review" of AAA documentation related to FCSP planning, procurement, and delivery. Findings and technical assistance were then reviewed via teleconference with Lori Sweeney, AAA Program Manager, and Mike Parkinson, AAA Program Analyst. There was general agreement that, as OAA's newest program, FCSP is still continuing a strong ramp-up phase for evolving the most comprehensive and cost-effective systems to help minimize the negative emotional, physical, and financial consequences of unpaid family caregiving.

Specific Program Reports—Older Californians Act Programs

Alzheimer's Day Care Resource Center (ADCRC)

Kathleen Hendrickson reviewed the RFP, contracts, and program monitoring for the ADCRC services. The AAA contracts with Redwood Coast Seniors, Inc., to provide services in Ft. Bragg and with Senior Supportive Services to provide services in Lucerne and Clearlake.

Ms. Hendrickson and Trayce Beards, AAA Program Specialist, met with Elizabeth Morton, Waldi Helma, and Joe Curren during a site visit conducted at Redwood Coast Seniors, Inc. The last monitoring of the ADCRC at Redwood Coast Seniors, Inc., was conducted in April 2008. The AAA used the Core Elements tool for monitoring, and there were no findings identified. Ms. Beards indicated that she will take a closer look at the following areas during the next monitoring visit:

- Documentation of In-Service training for staff and volunteers,
- Documentation of counseling and individual training provided to families and caregivers,
- Outreach activities to increase ADCRC enrollment and attendance, and
- Status of monthly caregivers and professionals.

The last monitoring of the ADCRC at the Senior Supportive Services sites in Lucerne and Clearlake was conducted in January, February, and May of 2008. The AAA used the Core Elements tool for monitoring and there were no findings identified. Ms. Beards indicated that the sites need assistance with improving their documentation in their client charts and will be arranging for Senior Supportive Services to receive training from Redwood Coast Seniors, Inc., to improve their charts.

Brown Bag

Barbara Estrada met with Trayce Beards, AAA Program Specialist, to review the Brown Bag monitoring tool. The AAA contracts with Clear Lake Gleaners, to provide Brown Bag services in the PSA. Clear Lake Gleaners has been having some difficulty obtaining sufficient food to meet the community need. However, the holiday season usually brings abundant food donations. The AAA offered to revisit the issue in January 2009, to determine if the food shortage still exists in this program.

Linkages

The AAA contracts with CCMC to provide Linkages services in Lake and Mendocino counties. The sites serve approximately 125 clients. Services are located in Ukiah, Ft. Bragg, and Clearlake. Ms. Hendrickson reviewed the contract, RFP, and the May 20, 2008, monitoring of this program. There was one finding associated with the language in the site's grievance policy.

Ms. Hendrickson, accompanied by Mike Parkinson, AAA Program Analyst, and Trayce Beards, AAA Program Specialist visited the Linkages site at CCMC and met with

Mary Ann McCorquodale, CCMC Supervisor, and Dennis Fay, CCMC Executive Director. Despite the distance between their sites, the program is well organized and provides excellent care management.

BEST PRACTICES OR MODELS OF SERVICE DELIVERY

Best practices or models of service delivery discovered during the monitoring of Area Agencies on Aging (AAA) are being identified by the California Department of Aging (CDA) to share with the aging network and other agencies or individuals interested in developing senior services in their community.

Listed below are either Best Practices or models of service delivery identified during the monitoring visit conducted by CDA and discussed at the Exit Conference. We will place on CDA's website, these best practices or models of service delivery along with the AAA staff you select to provide guidance to individuals seeking information on specific activities, programs, and services.

Area Plan Achievement

Area Plan Matrix

When developing the Area Plan, goals and objectives are identified and put into a matrix format. The matrix has columns that include Objective, Projected Start & End Dates, Persons Responsible, How, Progress, and Status. During the year the Matrix is used to track progress and update AAA staff, Governing Board members, and Advisory Council members. When the Area Plan Update is due, documenting the progress and status of goals and objectives is already complete and the matrix only needs to be transferred into the new document. This format is clear, concise, and keeps AAA staff informed and on track to accomplish their goals.

AAA Fiscal Review

Fiscal Monitoring Report

The AAA's Fiscal Monitoring Report includes the combination of a fiscal review tool and responses designed to examine each program standard. Each standard covers the same financial performance areas CDA uses in its fiscal review monitoring tool. The report is easy to understand and is a tool that other AAAs can implement.

Title III C—Elderly Nutrition Program (ENP)

Division of Administrative and Programmatic Annual Monitoring Tools for the ENP

The assessment tool for Annual ENP review has been divided to separate programmatic and administrative sections to be reviewed by the dietitian and the Program Specialist. The divided tool helps the analyst and the dietitian avoid duplication of work as nutrition programs are monitored.

Home Delivered Meals (HDM) Eligibility Assessment Form

The HDM eligibility assessment form includes three assessments on a single sheet. When all three sections of the sheet have been completed, staff know the next assessment would be the annual update. Having the form set up in this manner provides an easy method to determine if all assessments have been completed in the year.

Linkages

Disaster Preparation with Clients

Most Linkages sites do not discuss disaster preparation with their clients. Although the AAAs or Linkages sites prepare for disaster situations themselves, most have not discussed this with clients. The Linkages supervisor, informed CDA staff that her staff will begin to incorporate disaster preparation into each client's care plan. This plan will be updated as necessary and the care manager will discuss the plan with the client during the yearly reassessment or when the client's circumstances change (a move, death of a caregiver, etc.).

TECHNICAL ASSISTANCE

One purpose of the monitoring visit is for CDA staff to provide technical assistance to AAA staff on specific program standards that did not rise to the level of a finding that would require formal corrective action. Detailed below is specific technical assistance provided by the program team during the monitoring visit.

Staffing and Organization

Although the organizational chart matched the Total Title III Column on the Schedule of Paid Personnel Costs of the Area Plan budget, the personnel costs were not broken out by funding category. As the organizational chart was corrected during the time of the monitoring visit, the requirement to have a budget that includes a schedule of paid personnel costs by position, title, and funding source that agrees with the organizational chart was covered as technical assistance instead of a corrective action.

Procurement/Request for Proposal (RFP)

The Proposal Cover Sheet (Appendix D) includes an area for applicants to indicate which program area they are applying for; however, the program areas listed include multiple service categories within a single program area. AAA staff were instructed to revise the Proposal Cover Sheet to list individual service categories to be funded when the next RFP is issued.

Procurement/Contract Process

In reviewing the service provider contract, CDA staff noted the Budget Summary (Exhibit C) was not a line item budget as required. It was discovered that this document was not the budget summary but was an allocation summary. AAA staff were encouraged to change the name of the form to clearly identify what information is included in this Exhibit.

Title III B—Supportive Services (General)

Outreach service providers have been in transition from providing Information & Assistance (I&A) to providing Outreach. Many of the sites go beyond providing I&A and outreach and assist their local community by making home visits and providing transportation and other services. This was observed at Lucerne Alpine Seniors where staff know most of the local seniors and provide services that are not a part of Outreach or I&A. Centers can provide services they feel meet the needs of their community. However, in collecting data for Outreach, the data must reflect the activities as defined in the National Aging Program Information System (NAPIS).

Title III B—Information and Assistance (I&A)

Kathleen Hendrickson and Kathy Johnson discussed required consent when I&A staff intervene on a senior's behalf to assist in establishing eligibility. Ms. Johnson provided a copy of questions and answers concerning I&A that had been received from Damon Nelson, a former CDA Aging Programs Specialist.

The document contained the following question and answer.

Question from AAA 26-Client Confidentiality: “I suspect that many of us violate the “written release of information” specification on a regular basis. If I had to obtain a written release in order to contact other agencies for clients, I&A would grind to a halt. Do other AAAs have methods we should be drawing from? My process is to include written documentation in my clients notes (ex: “per client request, made referral to IHSS”) but I’m not securing written releases when clients request that I contact someone on their behalf.”

Answer from Damon Nelson, former CDA Aging Programs Specialist:
“Title 22 Section 7533(c)(1) states, “Intervene on behalf of the older individual to assist in establishing eligibility for a needed service, provided the older individual has given permission for the I&A provider to do so.” There is no mention of a “written release”. The process for written documentation in the client notes that the client requested a referral meets the requirement.”

Disaster Preparedness

AAA staff was encouraged to start their disaster preparation project by first organizing the AAA office. Those plans could then be duplicated by each of their service providers.

The Welfare and Institutions Code, Section 9625, requiring Senior Centers to develop and maintain a written emergency operations plan was discussed. Although AAA staff have been providing this information to the senior centers in both counties, staff questioned if it was the AAA’s responsibility to enforce the regulation. It is not the responsibility of the AAA to enforce this regulation; however, the AAA and their service providers are required to have written procedures to assist older individuals during natural disasters per California Code of Regulations, Section 7529.

Title III C—Elderly Nutrition Program (ENP)

Frozen Meals

Many of the Elderly Nutrition Sites in Lake and Mendocino Counties produce frozen meals which are provided to Home Delivered Meals (HDM) participants on weekends. The procedures used to produce the meals are not documented. Without procedures in place, there is no assurance that food safety has been maintained. The dietitian should work with the sites to develop written procedures that assure food safety by following California Retail Food Code (CRFC) requirements and Hazard Analysis and Critical Control Point (HACCP) principles.

Portion Control

At the Lucerne Alpine Senior Center different portion sizes were served to the HDM and congregate meal participants. Different portions sizes result in different amounts of nutrients provided in the meals. To assure provision of the required nutrients the dietitian should provide a portion control explanation sheet with each menu. Each

portion control explanation sheet should include serving sizes and what serving implement should be used to provide the appropriate serving size.

Staff Training

A sign-in sheet is a significant part of the documentation for staff training. It is recommended that the sign-in sheets list the names of paid staff and volunteers expected to attend. The training attendees then sign next to their name. This method provides documentation of attendance trends and allows the trainer to follow-up with individuals who did not receive the training. It was also recommended that staff provide handouts and/or alternate training to those who are unable to attend the meeting and note the provision of the material on the attendance sheet.

Title III E—Family Caregiver Support Program (FCSP)

Use of the Term “Caregiver”

The AAA resource directories for both counties associate the term “caregiver” with both the paid home care worker and the unpaid family member or friend providing care. As a result, family members or friends that could benefit from caregiver support may have a misconception of the term and not self-identify as a potential client for support from FCSP. The AAA was encouraged to limit the use of the term “caregiver” to mean only those providing unpaid in-home and community care to a family member or friend needing long-term care assistance. This would help enhance caregiver self-awareness and the FCSP provider’s ability to reach caregivers before the collapse of fragile unpaid caregiver support arrangements.

AAA Service Requirements for FCSP

The FCSP Scope of Work within service procurement documents (e.g., RFP and service provider agreement) should include the Title III requirement specified in Section 315(b) for voluntary contributions. Also, the AAA was asked to reconsider its requirement that FCSP funds may not be paid to non-agency individuals for respite services. CDA does not restrict the purchase of respite or other services from a neighbor, friend, or another family member. FCSP funds may also be used to pay for training, placement, and stipends for volunteers, including participants in federal service programs administered by the Corporation for National and Community Service. FCSP Service Matrix definitions have been revised to facilitate the use of trained volunteers, as specified in Section 373(d) of the OAA.

Caregiver Counseling Verses Case Management

The Caregiver Resource Center (CRC) originated as a California Department of Mental Health service. The provision of FCSP services through a CRC can result in confusion over service definition terms. The array of CRC services includes “family consultations/care planning” and “counseling” that is in the form of six to eight psychotherapy sessions. The FCSP Service Matrix established by CDA to ensure compliance with the federal service components in Section 373(b)(2) of the OAA defines “caregiver counseling” in much broader terms that can range from guidance to therapy. This Matrix also allows for caregiver case management in those rare situations

where caregivers are experiencing diminished capacities that temporarily impacts care responsibilities. For Fiscal Year 2008/09 Redwood Caregiver Resource Center is contracted to provide only 100 hours of counseling and an additional 250 hours of case management, which does not seem reasonable. The AAA was asked to ensure that CRC provides and reports services in accordance with FCSP Service Matrix standards.

Alzheimer's Day Care Resource Center (ADCRC)

An ADCRC monitoring report for Redwood Coast Seniors, Inc., documented eight support groups instead of the required twelve. The report mentioned that another organization was providing support groups in the area. Support group sessions do not have to be solely provided by the ADCRC. Staff can refer families and caregivers to support group sessions conducted by other organizations.

AAA staff indicated that Senior Supportive Services staff are reluctant to perform a cognitive assessment as required when a client is being enrolled in the program. Senior Supportive Services staff report that some participants become agitated when tested. The following information was discussed:

- ADCRCs are required to perform a cognitive assessment when a participant is enrolled in the program. The cognitive assessment evaluates the participant's level of functioning so that the ADCRC staff can identify activities appropriate for the participant.
- If the participant becomes agitated during the test, it is acceptable for the staff member to end the test and try again on another day.
- If the client is unable to speak or cannot understand the questions the test does not have to be performed; however, staff should consult with family members or the participant's caregiver during the initial assessment and when performing a reassessment to obtain information about the participant's level of functioning at home. The participant should also be observed at the center for interaction with staff and other participants. Observations and information from the family and staff members should be recorded in the participant's chart.

The role of volunteers, staffing, and training requirements were discussed related to the issues at Redwood Coast Seniors, Inc. The ADCRC is required to provide adequate training for volunteers at the center. In addition, according to the California Welfare and Institutions Code, the ADCRC must provide "adequate and appropriate staffing to meet the nursing, psychosocial, and recreational needs of the participants."

FINDINGS REQUIRING CORRECTIVE ACTION

Included below is a formal description of findings that led to the corrective actions detailed in the Report of Required Corrective Actions (see attached) presented at the Exit Conference conducted by CDA on October 9, 2006. For your convenience, specific corrective actions to be taken by the AAA to address each finding are summarized in a Corrective Action Plan (CAP) format that is included as part of this report. The CAP will be transmitted electronically to the AAA to ease completion and submission to CDA.

Administrative Review

Advisory Council

California Code of Regulations (CCR) Section 7302(a)(12)(D) states in part that the composition of the Advisory Council should represent the percentage of the Planning and Service Area's (PSA) older population and race and ethnicity for each of the following categories:

1. White
2. Hispanic
3. Black
4. Asian/Pacific Islander
5. Native American/Alaskan Native
6. Other

The county population includes 4% Hispanic individuals, while none of the Advisory Council members are Hispanic. This leaves the Council with reduced representation on issues that impact Hispanic individuals.

Corrective Action: Recruit Advisory Council members that represent the ethnic composition of the community with particular emphasis on recruiting members representing the Latino/Hispanic community.

Procurement Process

Request For Proposal (RFP) Process

CCR Section 7400(a)(2) specifies each AAA shall include a requirement in all contracts and subgrant agreements with service providers that all service providers must establish a written grievance process for reviewing and attempting to resolve complaints of older individuals. The AAA's current contract language does not contain this required language.

Corrective Action: Include a requirement in all service provider contracts to establish a written grievance process for reviewing and attempting to resolve complaints of older individuals.

Management of Service Providers

As specified in CDA's Standard Agreement, Exhibit A, Article II, the AAA must annually conduct onsite program and fiscal monitoring and evaluate and document subcontractor performance. Although program monitoring was being conducted, reports were written, and deficiencies and timelines for correction were established, no information could be found to indicate that corrective actions were followed-up on to ensure the service provider had come back into compliance.

Corrective Action: Develop a formal follow-up procedure to ensure service providers respond to corrective actions identified in monitoring reports.

Data Reporting

CDA's Standard Agreement, Exhibit E, Article II(C)(1-5), requires AAAs to have written, program specific reporting procedures. Although the Senior Program Specialist has a good understanding of the data system and reports timely, there is no desk manual that contains written data collection and reporting procedures or procedures for ensuring data accuracy.

Corrective Action: Develop, update, and maintain a written data collection/reporting procedures manual.

AAA Fiscal Review

Financial Reporting:

45 Code of Federal Regulations (CFR) Section 92.20(b)(1) specifies that AAAs and service providers must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities. May 2008 timesheets for three program staff reporting time in Administration and Direct Services were reviewed. One staff member's timesheet was changed after it was signed by the employee and the supervisor. Hours originally documented as Title III B Ombudsman were changed to Title III D Medication Management. The revised timesheet was not submitted to the supervisor for approval before the May 2008 expenditures were reported to CDA.

Corrective Action: Ensure employee timesheet changes are approved by the appropriate supervisor.

45 CFR Section 92.20(b)(1) specifies that AAAs and service providers must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities. The contracts between the AAA and service providers contain report submission requirements that were not always adhered to. Some service provider monthly invoices were received late, which delayed AAA staff approval. As a result, the expenditure and request for funds files due March 30, April 30, and May 30, 2008 were submitted late to CDA.

Corrective Action: Submit Monthly Expenditure Reports and Request for Funds in a timely manner.

45 CFR Section 92.20(b)(1) specifies that AAAs and service providers must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities. Title III C-1 and III C-2 Nutrition Education expenses were not being reported to CDA as they were incurred by service providers during Fiscal Year (FY) 2007/08. Those costs were subsequently reported when the Closeout was submitted to CDA in September 2008.

Corrective Action: Ensure Nutrition Education costs are reported as they are incurred.

45 CFR Section 92.20(b)(1) specifies that AAAs and service providers must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities. The AAA contracts with the Clear Lake Gleaners to provide the Brown Bag program. The service provider is receiving donations; however, the Brown Bag service provider's monthly expenditure report does not include a place to report program income.

Corrective Action: Revise the Brown Bag service provider monthly invoice to provide a place to report program income.

45 CFR Section 92.20(b)(1) specifies that AAAs and service providers must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities. The AAA contracts with Middletown Senior Center to provide Title III B Outreach. The service provider is reporting these costs as Title III B Information and Assistance on the monthly invoice. AAA staff did not verify that the service provider is reporting costs as budgeted.

Corrective Action: Ensure service providers report monthly by each funded service category.

45 CFR Section 92.20(b)(1) specifies that AAAs and service providers must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities. The contract between the AAA and the Lakeport Senior Center specifies that "...an invoice detailing administrative, and programmatic activities, as well as expenses of the prior month shall be prepared and submitted to the AAA for processing and approval." During May 2008, Lakeport Senior Center submitted two separate invoices for the same report period. Both invoices were paid and the expenditures were reported to CDA.

Corrective Action: Develop a system to ensure service providers do not submit multiple expenditure reports for the same period to the AAA and to CDA.

45 CFR Section 92.20(b)(1) specifies that AAAs and service providers must establish and maintain a financial reporting system that reflects accurate, current, and complete disclosure of its financial activities. Currently, service providers are required to submit an expenditure report and a monthly request for funds. The Monthly Invoice indicates that the payments are based on reimbursement for the prior month expenditures. In addition, the Monthly Invoice of expenditures is not compared to the Request for Funds amount. Although the AAA is requiring service providers to submit both an expenditure report and a request for funds, it appears that the service providers are reimbursed for expenditures.

Corrective Action: Discontinue requiring service providers to submit a Request for Funds when reimbursing for actual expenditures.

Budget Control

45 CFR Section 92.20(b)(4) specifies that AAAs must maintain a system that compares actual expenditures with budgeted amounts for each contract or sub-provider contract. On the FY 2008/09 Area Plan Budget (CDA 122), the AAA included the Dietician's time under Area Plan Administration. The contract between the AAA and the Dietician indicates that part of the costs should be budgeted as Title III C-1 and Title III C-2 program.

Corrective Action: Budget the AAA Dietitian's time as a direct cost in the Area Plan Budget under C-1 & C-2.

45 CFR Section 92.20(b)(4) specifies that AAAs must maintain a system that compares actual expenditures with budgeted amounts for each contract or sub-provider contract. Actual expenditures are not being compared to service provider budgets. During FY 2007/08, service providers budgeted costs for Nutrition Education but did not report expenditures.

Corrective Action: Develop a system that compares budget amounts to actual expenditures for all service categories.

45 CFR Section 92.20(b)(4) specifies that AAAs must maintain a system that compares actual expenditures with budgeted amounts for each contract or sub-provider contract. The Agreement between the AAA and the Clear Lake Gleaners' Brown Bag program did not include Program Income as a funding source. The service provider is collecting donations from participants but is not including any program income in its budget. In addition, the AAA is only budgeting program income for nutrition and ADCRC although all Title III and VII service providers must give participants an opportunity to contribute to the cost of the services. All service provider budget forms should include a place to budget program income.

Corrective Action: Revise the Brown Bag service provider budget to include program income.

Corrective Action: Budget program income for all service providers that collect donations from participants.

Internal Control

45 CFR Section 92.20(b)(3) requires AAAs to maintain effective control and accountability for all cash and other assets. The Report of Project Property/Purchased with Agreement Funds (CDA 32) submitted to CDA in September 2008 was incomplete. The form did not include model numbers, serial numbers, location, date of purchase, purchase costs, fund source, and CDA numbers for several items included on the list. CDA staff verified that these items are located at the Lucerne Senior Center and therefore the CDA 32 should have included the required information for each item.

Corrective Action: Complete and submit the Report of Project Property/Purchased with Agreement Funds (CDA 32) for any inventory purchased with CDA funds by the AAA or its service providers.

45 CFR Section 92.20(b)(3) requires AAAs to maintain effective control and accountability for all cash and other assets. The AAA does not have a desk manual that documents the duties and fiscal responsibilities for the AAA.

Corrective Action: Develop, update, and maintain a desk manual that contains written procedures to reflect current fiscal processes

Cash Management:

45 CFR Section 92.20(b)(7) specifies that AAAs shall establish procedures for minimizing the time elapsing between the drawdown of contract funds and the disbursement to service providers. The AAA does not have a system for reconciling monthly expenditures against advances. Currently, service providers submit a monthly expenditure report and a separate request for funds. AAA staff review and approve both reports but do not compare the two for accuracy. For example, Lakeport Senior Center submitted invoices for May 2008 expenditures that exceeded their request for funds.

Corrective Action: Reconcile each service provider's monthly expenditures against advances and adjust payments to the service providers based on need.

Specific Program Reports—Older Americans Act Programs

Title III B—Supportive Services (General)

During a discussion with staff at CCMC it was discovered that the funding for Title III B Supportive Services Personal Care, Chore, and Homemaker is used only for Linkages clients. Title III B Supportive Services must be available to all seniors aged 60 years and older who qualify for services. CCMC does not have a designated staff member who is responsible for the Title III B programs because the services are provided

through Linkages and overseen by the Linkages supervisor. CCMC staff discussed the possibility of transferring the Title III B program responsibility to Kathy Johnson, Community Resources Specialist.

Corrective Action: Ensure Title III B Personal Care, Homemaker, and Chore services are available to the eligible service population. U.S. Code 42, Section 3022 (35)

Title III C—Elderly Nutrition Program (ENP)

The California Retail Food Code (CRFC) Section 113982, Food Transportation (a)(3) states in part that approved methods shall be used to maintain potentially hazardous food at the required holding temperatures. Food must be transported in a manner that prevents contamination and that maintains food at proper temperatures. The cold portions of the HDM at the Lucerne site are transported in an uncovered container without insulation, ice, or cold packs to maintain temperature.

Corrective Action: Ensure the cold portions of HDMs are transported in closed, insulated containers with ice or other appropriate cold pack.

CCR Section 7636.5(f) requires documentation of training to include evaluations and that attendance records shall be maintained. Though staff training has been provided, there is no documentation to substantiate the dates, topics provided, evaluation of the presentation, or attendees who were present. The AAA has recently provided binders to maintain training documentation; however, the binders have not been used.

Corrective Action: Ensure each service provider maintains staff training documentation.

The CRFC is based on the federal Model Food Code which represents the best available science in the overall goal of preventing foodborne illness. CRFC Section 114268 specifies that floors shall be of smooth and of durable construction and nonabsorbent material that is easily cleanable. CRFC Section 114271 specifies that walls and ceilings shall be of durable, smooth, non absorbent, and easily cleanable surface.

A review of the Lucerne Alpine Senior Center site found the following issues exist and require correction under the CRFC:

1. Carpet for flooring in the pot storage area which opens into the kitchen,
2. Paint peeling from the walls over food preparation areas,
3. A hole in the wall large enough to allow vermin to enter,
4. The exhaust hood over the stove was thick with grease, and
5. The temperature in the refrigerator according to the integrated thermometer was 45 degrees. To assure the safety of the food, it is recommended that an alternate calibrated thermometer be used as a back-up system to verify the

temperature of the refrigerator. If the core temperature at the lowest setting is above 41 degrees, the refrigerator needs to be serviced.

Corrective Action: Require the Lucerne Senior Center to correct the following food safety and sanitation issues:

1. Replace the carpet with flooring acceptable under CRFC.
2. Remove chipped paint and repaint kitchen and dish room.
3. Repair the hole in the outside kitchen wall in the pan storage area.
4. Thoroughly clean the stove exhaust hood.
5. Ensure refrigerator temperature is maintained at or below 41 degrees.

Section 315(b)(4)(B) of the OAA states that providers must clearly inform each recipient that there is no obligation to contribute and that the contribution is purely voluntary. The donation signs at each senior center did not include this language.

Corrective Action: Ensure all requests for donations include language stating that services will not be denied to individuals who do not contribute to the cost of meals.

CCR Section 7638.9(f) states that the service provider shall ensure the amount of the eligible participant's contribution is kept confidential and that the service provider shall establish written procedures to protect contributions and fees from loss, mishandling and theft. The donation box at Lakeport Senior Center did not have a lock on it. The box could easily have been opened to remove the donations.

Corrective Action: Require Lakeport Senior Center to place a lock on the donation box to secure donations.

A review of the contracts for the nutrition service providers and the AAA/service provider dietitian found that there is duplication in the documents requiring both the service provider and the contracted dietitian to provide Nutrition Education. Since the contracted dietitian is responsible for developing and presenting nutrition education, these items should remain in her contract.

Corrective Action: Amend the Nutrition Education contract language to clarify the responsibility of each nutrition service provider to:

1. Maintain documentation of Nutrition Education,
2. Disseminate Nutrition Education to Home-Delivered Meal Participants, and
3. Report Nutrition Education units.

Title III E—Family Caregiver Support Program (FCSP)

Section 372(a) of the OAA limits FCSP service eligibility criteria to two subgroups: family caregivers 18 years of age or older (e.g., family, friends, or neighbors) providing unpaid care to an older individual or an individual of any age with Alzheimer's disease or related disorder; and grandparents or other older adult relatives 55 years of age or older living with and have primary care responsibilities (because parents are unable or unwilling) for a child 18 years of age or younger or a child of any age with a disability. The AAA's RFP dated January 5, 2007, incorrectly identified a third FCSP service eligibility subgroup to be older individuals caring for people with disabilities of any age, which could be interpreted to include older parents caring for their disabled child of any age. This ineligible third subgroup is also listed under the Caregiver Respite and Support section in the AAA resource directories for both counties.

Corrective Action: Ensure FCSP-eligible caregiver criteria specified in AAA resource directories and service procurement documents are consistent with Title III E requirements.

Section 373(a) of the OAA states that the federal share of FCSP funds shall be used to ensure services are available for family caregivers and grandparents or other older adult relatives caring for a child. The AAA's needs assessment and resources gap analysis identifies whether federal funds must be used as a catalyst for generating local service capacity [as specified in CCR Section 373(b)(2)] for these two subgroups of FCSP-eligible caregivers. CCR 7300(c) specifies that the funding priorities are reflected in the Area Plan Budget and Service Unit Plan, which then guides procurement procedures specified in CCR 7354 and 7364. Based on review of AAA documentation, it is not clear if the AAA planned to serve FCSP-eligible grandparents. The Area Plan and Budget did not identify that FCSP services would be provided to grandparents. However, the AAA's RFP dated January 5, 2007, stated that FCSP eligibility specifications included these grandparents. The services agreement between the AAA and North Coast Opportunities (NCO), Inc., also includes FCSP-eligible grandparents in the Scope of Work, but the AAA resource directories and FCSP provider website do not identify the availability of the services for these grandparents.

Corrective Action: Determine if grandparents or other older relatives caring for a child will be served by the FCSP.

Section 302(1) of the OAA requires that all Title III Supportive Services (including FCSP) be provided in a manner that facilitates accessibility to, and utilization of, the services provided within the PSA. The OAA Amendments of 2000 called upon AAAs to expand their constituency to be served by helping the many thousands of unpaid individuals caring for their older loved ones. The Aging and Adult Services News section of the Mendocino Social Service website refers to seniors, but not their caregivers. Their available support services are also not easily identified within the AAA's resource directories for both counties. Also, the website for the FCSP-funded contractor [NCO's program called Redwood Caregiver Resource Center (RCRC)] does

not identify the availability of FCSP services, nor the FCSP eligibility criteria (exception being the reference to “caregivers of the frail elderly” on the Mission page).

Corrective Action: Ensure available FCSP services and applicable eligibility criteria are identified in AAA and Title III E service provider resources information.

Section 373(a) of the OAA specifies that the use of Title III E funds shall ensure that multifaceted support is provided to “family caregivers” (along with older relative caregivers of children). Section 302(3) of the OAA defines the term “family caregiver” to mean an adult family member, or another individual, who is an informal provider of in-home and community care to an older individual or to an individual with Alzheimer’s disease or a related disorder...” Per its application for FCSP funding, the Redwood Caregiver Resource Center states it “serves families who struggle to maintain, in the preferred home setting, their loved ones with adult onset brain impairments...”, which applies only to California Department of Mental Health-funded caregiver support. While this may be a FCSP priority for families where the loved one is 60 years of age or older [OAA Section 373(c)(2)(A)], family caregivers of those older individuals not having a brain impairment cannot be automatically denied access to FCSP services.

Corrective Action: Ensure all OAA-eligible family caregivers have access to the FCSP multifaceted array of AAA-funded services, rather than just those caring for a loved one with mental impairment.

Section 373(c)(2) of the OAA specifies that priority shall be given to three targeted groups [as described in Sections 372(b)(1), 372(b)(2), 373(c)(2)(A), and 373(c)(2)(B) of the OAA, which overlaps already listed priorities] when providing FCSP services. The AAA’s RFP dated January 5, 2007, lists the three priorities under FCSP eligibility specifications, one of which is incorrect. Priority shall be given to caregivers of those *older individuals with dementia*, rather than older caregivers of individuals with dementia. This may have been confused with the OAA expectation to give priority to older individuals caring for individuals with severe disabilities, as specified in Sections 102(a)(48) and 373(c)(2)(B) of the OAA. Also, the Redwood Caregiver Resource Center priorities identified within its five applications did not correlate with OAA expectations. For example, the application to provide Community Education and Outreach states that priority for caregiver case management services will be given to caregivers caring for persons with special situations, including those living below poverty guidelines. However, the OAA Amendments of 2006 were revised to clarify that this priority applies to the special situation of *older caregivers*, not their care receivers.

Corrective Action: Ensure the AAA and contractor priorities for providing FCSP services to caregivers in consistent with Title III E requirements, as specified in the OAA.

Section 302(1) of the OAA requires FCSP services be provided in a manner designed to make the most efficient use of federal resources in order to meet an individual's needs. According to Section 101(4) of the OAA, these services are to be provided at an adequate level to appropriately sustain the caregiver in their caregiver role. Per its application for FCSP funding, the Redwood Caregiver Resource Center will provide "family caregivers with one-time-only respite awards of up to \$1,000". These across-the-board limitations could result in some caregivers not receiving an adequate level of temporary respite to sustain them in their caregiving role. While the OAA encourages efficient resource allocation to ensure maximum service effectiveness, procedures need to allow for flexibility in order to unnecessarily prevent the collapse of a fragile family caregiver support network.

Corrective Action: Ensure FCSP respite care is provided to caregivers in accordance with their assessed level of need, rather than a pre-established service accessibility limitation and funding level.